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Reply to Office Action of June 2, 2005

REMARKS

Introduction

Claim 15 has been added. Claims 1-15 are pending and under consideration.

In accordance with the foregoing, claim 13 has been amended merely to improve grammar and to provide proper antecedent basis, and therefore it is respectfully submitted that this amendment is not subject to any further limitations under the meaning of Festo Corp. v. Shoketsu Kinzoku Kabushiki Co., Ltd. 535 U.S. 722, 122 S.Ct. 1831, 152 L.Ed.2d 944, 62 USPQ2d 1705 (2002).

Applicants note with appreciation the Examiner's indication that priority has been claimed under 35 U.S.C. § 119, and that all certified copies have been received. Further, Applicants note with appreciation the Examiner's indication that the Information Disclosure Statement filed on January 24, 2005 has been received and considered.

No new matter is being presented since all amendments are supported by the originally submitted specification, and approval and entry are respectfully requested.

Applicant's are grateful for the Examiner's indication that claims 2-12 contain allowable subject matter. However, it is respectfully submitted that all of the pending claims in the instant application are allowable for at least the reasons stated below.

Rejection under 35 USC §103(a)

Claims 1 and 13-14

Claims 1 and 13-14 are rejected under 35 USC §103(a) as being unpatentable over Campbell et al., US Patent No.: 6,356,726 B1, in view of Ahn, US Patent No.: 6,763,213 B2. This rejection is respectfully traversed for at least the reasons stated below.

Regarding independent claim 1, at item 7 of the Office Action, the Examiner states that Campbell et al. "teaches an eraser attached to a developing device (FIGS. 7 and 8)." However, the Examiner then admits that Campbell et al. "does not teach separating the developing device

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from the photosensitive drum." The Examiner then concludes that since Ahn teaches "separating the developing device from the photosensitive drum," "[i]t would have been obvious to one of ordinary skill in the art at the time the invention was made to use the teaching of Ahn with the image forming device of Campbell et al. to reduce wear on the photosensitive drum."

Applicants' respectfully point out that the Examiner fails to address, among other things, any teaching of a "pre-transfer erasing lens," as recited in independent claim 1 of Applicant's invention. It is respectfully submitted that although FIGS. 7 and 8 of Campbell et al. illustrate a pre-transfer erase assembly 110 having a light guide 112 disposed at a lower end of a toner cartridge to guide light toward a PC drum 18, this assembly 110 does not disclose the use of a pre-transfer erasing lens. Moreover, even assuming that the pre-transfer erase assembly 110 of Campbell et al. did have a pre-transfer erasing lens, there is no teaching or suggestion that it would be "movably installed such that it moves to an erasure position at which the pre-transfer erasing lens is close to the photosensitive drum to provide erasure, and to a retracted position spaced apart from the photosensitive drum so as not to interfere therewith when the photosensitive drum unit is being mounted or dismounted," also as recited in independent claim 1 of Applicants' invention.

Regarding the invention by Ahn, the patent illustrates a plurality of developing units 42, 44, 46, and 48 that move with respect to a photosensitive drum 40 to sequentially contact the photosensitive drum 40 (See FIG. 5) while the photosensitive drum 40 is rotating. However, similar to Campbell et al., there is no teaching or suggestion in Ahn of "a pre-transfer erasing lens," or "a pre-transfer erasing lens to induce the light generated from the pre-transfer erasing lamp to the photosensitive drum, movably installed such that it moves to an erasure position at which the pre-transfer erasing lens is close to the photosensitive drum to provide erasure, and to a retracted position spaced apart from the photosensitive drum so as not to interfere therewith when the photosensitive drum unit is being mounted or dismounted," as recited in independent claim 1 of Applicants' invention. Thus, it is respectfully submitted that neither Campbell et al. nor Ahn, separately or in any combination thereof, teach or suggest, among other things, "a pre-transfer erasing lens," as recited in claim 1 of Applicants' invention, or where a pre-transfer erasing lens is "movably installed such that it moves to an erasure position at which the pre-transfer erasing lens is close to the photosensitive drum to provide erasure, and

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to a retracted position spaced apart from the photosensitive drum so as not to interfere therewith when the photosensitive drum unit is being mounted or dismounted," as recited in claim 1 of Applicants' invention.

It is respectfully submitted that in order to "establish *prima facie* obviousness of a claimed invention, all claim limitations must be taught or suggested by the prior art." In re Royka, 490 F.2d 981, 180 USPQ 580 (CCPA 1974). Furthermore, "all words in a claim must be considered in judging the patentability of that claim against the prior art." In re Wilson, 424 F.2d 1382, 1385, 165 USPQ 494, 496 (CCPA 1970). See also MPEP § 2143.03. Accordingly, it is respectfully submitted that since neither Campbell et al. nor Ahn teach or suggest every element as recited in independent claim 1, independent claim 1 is allowable over both Campbell et al. and Ahn separately or in any hypothetical combination thereof, and withdrawal of this rejection and allowance of this claim are earnestly solicited.

Regarding independent claim 13, at item 7 of the Office Action, the Examiner states that Campbell et al. "teaches an eraser attached to a developing device (FIGS. 7 and 8)." However, the Examiner then admits that Campbell et al. "does not teach separating the developing device from the photosensitive drum." The Examiner then concludes that since Ahn teaches "separating the developing device from the photosensitive drum," "[i]t would have been obvious to one of ordinary skill in the art at the time the invention was made to use the teaching of Ahn with the image forming device of Campbell et al. to reduce wear on the photosensitive drum." This rejection is respectfully traversed for at least the reasons stated below.

Applicants' respectfully point out that the Examiner fails to address, among other things, any teaching of a "pre-transfer eraser member to remove charges from a non-image region of the photosensitive drum by irradiating light onto the photosensitive drum after the toner image is developed, the pre-transfer eraser member being movable to a first position to direct the irradiated light to the photosensitive drum to perform erasing and being movable to a second position spaced apart from the photosensitive drum when the photosensitive drum unit is being mounted or dismounted," as recited in independent claim 13 of Applicant's invention. It is respectfully submitted that although FIGS. 7 and 8 of Campbell et al. illustrate a pre-transfer erase assembly 110 disposed at a lower end of a toner cartridge to guide light toward a PC drum 18, there is no teaching or suggestion that the pre-transfer erase assembly 110 is

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"movable to a first position to direct the irradiated light to the photosensitive drum to perform erasing and being movable to a second position spaced apart from the photosensitive drum when the photosensitive drum unit is being mounted or dismounted," as recited in independent claim 13 of Applicants' invention.

Regarding the invention by Ahn, the patent illustrates a plurality of developing units 42, 44, 46, and 48 that move with respect to a photosensitive drum 40 to sequentially contact the photosensitive drum 40 (See FIG. 5) while the photosensitive drum 40 is rotating. However, there is no teaching or suggestion of "a pre-transfer eraser member," let alone "a pre-transfer eraser member to remove charges from a non-image region of the photosensitive drum by irradiating light onto the photosensitive drum after the toner image is developed, the pre-transfer eraser member being movable to a first position to direct the irradiated light to the photosensitive drum to perform erasing and being movable to a second position spaced apart from the photosensitive drum when the photosensitive drum unit is being mounted or dismounted," as recited in independent claim 13 of Applicants' invention. Thus, it is respectfully submitted that neither Campbell et al. nor Ahn, separately or in any combination thereof, teach or suggest, among other things, "a pre-transfer eraser member...being movable to a first position to direct the irradiated light to the photosensitive drum to perform erasing and being movable to a second position spaced apart from the photosensitive drum when the photosensitive drum unit is being mounted or dismounted," as recited in claim 13 of Applicants' invention. Accordingly, it is respectfully submitted that since neither Campbell et al. nor Ahn, separately or in any combination thereof, teach or suggest every element as recited in independent claim 1, independent claim 1 is allowable over both Campbell et al. and Ahn separately or in any hypothetical combination thereof, and withdrawal of this rejection and allowance of this claim are earnestly solicited. See *prima facie* obviousness requirement *supra*.

For at least the reason that claim 14 depends from allowable independent claim 13, claim 14 is also allowable, and withdrawal of the rejection of this claim is earnestly solicited.

New Claim 15

Independent claim 15 has been newly added. New independent claim 15 recites similar features as those recited in independent claims 1 and 13, which as pointed out above, are not disclosed, taught, or suggested in the prior art of record, such as, for example, "a pre-transfer

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erasing unit movable between a first position to remove charges from a non-image region of the photosensitive drum and a second position to prevent the pre-transfer erasing unit from interfering with mounting or dismounting of the photosensitive drum." Accordingly, it is respectfully submitted that new claim 15 is also allowable over the prior art of record, and allowance of this claim is earnestly solicited.

Conclusion

There being not other objections or rejections, it is submitted that the application is in a condition of allowance, and an early action to this effect is courteously solicited.

No Fee has been incurred by this Amendment. However, if any further fees are required in connection with the filing of this Amendment, please charge the same to our deposit account number 502827.

Should any questions remain unresolved, the Examiner is respectfully requested to telephone Applicant's attorney.

Respectfully submitted,

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